

**U.S. District Court**  
**District of Columbia (Washington, DC)**  
**CIVIL DOCKET FOR CASE #: 1:15-cv-01720-RMC**

CITIZENS UNITED v. UNITED STATES DEPARTMENT OF STATE  
 Assigned to: Judge Rosemary M. Collyer  
 Cause: 05:552 Freedom of Information Act

Date Filed: 10/19/2015  
 Jury Demand: None  
 Nature of Suit: 895 Freedom of Information Act  
 Jurisdiction: U.S. Government Defendant

**Plaintiff****CITIZENS UNITED**

represented by **Matthew D. McGill**  
 GIBSON, DUNN & CRUTCHER, LLP  
 1050 Connecticut Avenue, NW  
 Suite 200  
 Washington, DC 20036  
 (202) 887-3680  
 Fax: (202) 530-9662  
 Email: [mmcgill@gibsondunn.com](mailto:mmcgill@gibsondunn.com)  
*ATTORNEY TO BE NOTICED*

**Ralph Christian Berg**  
 CITIZENS UNITED  
 1006 Pennsylvania Avenue, SE  
 Washington, DC 20003  
 (202) 547-5420  
 Fax: (202) 547-5421  
 Email: [chris@chrisberglaw.com](mailto:chris@chrisberglaw.com)  
*ATTORNEY TO BE NOTICED*

V.

**Defendant****UNITED STATES DEPARTMENT OF STATE**

represented by **Joseph Evan Borson**  
 U.S. DEPARTMENT OF JUSTICE  
 Civil Division, Federal Programs Branch  
 1100 L Street NW  
 Washington, DC 20005  
 (202) 514-1944  
 Fax: (202) 616-8460  
 Email: [joseph.borson@usdoj.gov](mailto:joseph.borson@usdoj.gov)  
*LEAD ATTORNEY*  
*ATTORNEY TO BE NOTICED*

**Bailey Wilson Heaps**  
 U.S. DEPARTMENT OF JUSTICE  
 Civil Division  
 20 Massachusetts Avenue, NW  
 Washington, DC 20001  
 (202) 514-1280  
 Fax: (202) 616-8470  
 Email: [bailey.w.heaps@usdoj.gov](mailto:bailey.w.heaps@usdoj.gov)  
*TERMINATED: 04/10/2017*

Date Filed	#	Docket Text
10/19/2015	<u>1</u>	COMPLAINT against UNITED STATES DEPARTMENT OF STATE ( Filing fee \$ 400 receipt number 0090-4282245) filed by CITIZENS UNITED. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit A, # <u>3</u> Exhibit B, # <u>4</u> Exhibit C, # <u>5</u> Summons Attorney General, # <u>6</u> Summons State Department, # <u>7</u> Summons US Attorney)(Berg, Ralph)

		(Entered: 10/19/2015)
10/19/2015	<u>2</u>	Corporate Disclosure Statement by CITIZENS UNITED. (Berg, Ralph) (Entered: 10/19/2015)
10/19/2015		Case Assigned to Judge Rosemary M. Collyer. (md) (Entered: 10/20/2015)
10/21/2015	<u>3</u>	SUMMONS (3) Issued Electronically as to UNITED STATES DEPARTMENT OF STATE, U.S. Attorney and U.S. Attorney General (jf) (Entered: 10/21/2015)
11/05/2015	<u>4</u>	NOTICE of Appearance by Matthew D. McGill on behalf of CITIZENS UNITED (McGill, Matthew) (Entered: 11/05/2015)
11/25/2015	<u>5</u>	ANSWER to Complaint by UNITED STATES DEPARTMENT OF STATE. (Attachments: # <u>1</u> Exhibit A)(Heaps, Bailey) (Entered: 11/25/2015)
11/30/2015		MINUTE ORDER requiring the parties to confer and file a joint proposed dispositive motion briefing schedule no later than December 15, 2015. Signed by Judge Rosemary M. Collyer on 11/30/2015. (KD) (Entered: 11/30/2015)
11/30/2015		Set/Reset Deadlines/Hearings: Joint proposed dispositive motion briefing schedule due by 12/15/2015. (cdw) (Entered: 12/01/2015)
12/15/2015	<u>6</u>	MEET AND CONFER STATEMENT. (Heaps, Bailey) (Entered: 12/15/2015)
12/30/2015		Set/Reset Deadlines/Hearings: Status Conference set for 1/19/2016 at 11:00 AM in Courtroom 8 before Judge Rosemary M. Collyer. (cdw) (Entered: 12/30/2015)
01/19/2016		MINUTE ORDER: Defendant is ORDERED to produce to Plaintiff by January 25, 2016, 1293 pages consisting of an officially archived set of former Secretary Clinton's daily calendars during her tenure. Defendant shall produce 2455 files containing final and mini schedules to Plaintiff at the same time that Defendant produces them to the Associated Press. Defendant shall search for the trip books for the 87 trips that Plaintiff has identified. No later than March 4, 2016, the parties shall meet and confer and file a joint proposed schedule for production of the trip books. A telephone conference is scheduled for February 9, 2016 at 11:00 a.m. for the purpose of discussing what records can be searched, if any, to determine when former Secretary Clinton attended meetings while she was on the 87 identified trips that were not reflected on the officially archived calendars, the final schedules, or the mini schedules for those trips. Signed by Judge Rosemary M. Collyer on 1/19/2016. (KD) (Entered: 01/19/2016)
01/19/2016		Minute Entry for proceedings held before Judge Rosemary M. Collyer: Status Conference held on 1/19/2016. (Court Reporter: Crystal Pilgrim) (cdw) (Entered: 01/19/2016)
02/09/2016		Minute Entry for proceedings held before Judge Rosemary M. Collyer: Telephone Conference held on 2/9/2016. (Court Reporter Crystal Pilgrim.) (zmm) (Entered: 02/09/2016)
02/09/2016		MINUTE ORDER: For the reasons stated on the record at the telephone conference on February 9, 2016, Defendant is ORDERED to search the emails of schedulers Lona Valmoro and Linda Dewan for the period from November 3, 2012 through December 7, 2012, for references in the body of the emails to meetings and requests to schedule meetings with Secretary Clinton for any time from December 3, 2012 through December 7, 2012 when Secretary Clinton traveled to Ireland, Northern Ireland, Belgium, and the Czech Republic. Defendant shall use all of the dates from December 3 through 7, 2012 as search terms. Defendant shall file a status report regarding this search no later than February 29, 2016. Signed by Judge Rosemary M. Collyer on 2/9/2016. (KD) (Entered: 02/09/2016)
02/09/2016		Set/Reset Deadlines: Status Report due by 2/29/2016. (zmm) (Entered: 02/09/2016)
02/29/2016	<u>7</u>	STATUS REPORT Regarding Search of E-Mail Records by UNITED STATES DEPARTMENT OF STATE. (Heaps, Bailey) (Entered: 02/29/2016)
03/04/2016	<u>8</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF STATE. (Heaps, Bailey) (Entered: 03/04/2016)

03/07/2016		MINUTE ORDER requiring the parties to file a joint status report no later than June 6, 2016. Signed by Judge Rosemary M. Collyer on 3/7/2016. (KD) (Entered: 03/07/2016)
03/07/2016		Set/Reset Deadlines/Hearings: Joint Status Report due by 6/6/2016. (zcdw) (Entered: 03/08/2016)
05/20/2016	<u>9</u>	MOTION for Extension of Time to <i>Produce Responsive, Non-Exempt Portions of "Trip Book"</i> by UNITED STATES DEPARTMENT OF STATE (Attachments: # <u>1</u> Declaration of Eric F. Stein)(Heaps, Bailey) (Entered: 05/20/2016)
05/23/2016	<u>10</u>	Memorandum in opposition to re <u>9</u> MOTION for Extension of Time to <i>Produce Responsive, Non-Exempt Portions of "Trip Book"</i> filed by CITIZENS UNITED. (Attachments: # <u>1</u> Text of Proposed Order)(McGill, Matthew) (Entered: 05/23/2016)
05/24/2016		MINUTE ORDER granting <u>9</u> Defendant's Motion for Extension of Time for good cause shown. Defendant shall produce all non-exempt portions of the Trip Book (for the December 3-7, 2012 trip to Ireland, N.Ireland, Belgium, and the Czech Republic) by June 10, 2016. The parties shall file a joint status report and proposed schedule by June 27, 2016. The May 20 production deadline and June 27 status report date are vacated. Signed by Judge Rosemary M. Collyer on 5/24/2016. (KD) (Entered: 05/24/2016)
06/27/2016	<u>11</u>	Joint STATUS REPORT by UNITED STATES DEPARTMENT OF STATE. (Heaps, Bailey) (Entered: 06/27/2016)
06/28/2016		MINUTE ORDER requiring State to make its first production of documents pursuant to the parties' joint status report <u>11</u> no later than August 30, 2016, with subsequent productions to be made every four weeks. The parties shall file a joint status report no later than October 17, 2016. Signed by Judge Rosemary M. Collyer on 6/28/2016. (KD) (Entered: 06/28/2016)
06/28/2016		Set/Reset Deadlines/Hearings: Joint Status Report due by 10/17/2016. (cdw) (Entered: 06/28/2016)
10/14/2016	<u>12</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 10/14/2016)
10/17/2016		MINUTE ORDER requiring the parties to file a joint status report no later than January 16, 2017. Signed by Judge Rosemary M. Collyer on 10/17/2016. (DAS) (Entered: 10/17/2016)
10/17/2016		Set/Reset Deadlines/Hearings: Joint Status Report due by 1/16/2017. (cdw) (Entered: 10/18/2016)
01/13/2017	<u>13</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 01/13/2017)
01/17/2017		MINUTE ORDER requiring the parties to submit a joint status report no later than April 13, 2017 and every 90 days thereafter. Signed by Judge Rosemary M. Collyer on 1/17/2017. (DAS) (Entered: 01/17/2017)
01/17/2017		Set/Reset Deadlines/Hearings: Joint Status Report due by 4/13/2017. (cdw) (Entered: 01/18/2017)
04/10/2017	<u>14</u>	NOTICE OF SUBSTITUTION OF COUNSEL by Joseph Evan Borson on behalf of UNITED STATES DEPARTMENT OF STATE Substituting for attorney Bailey W. Heaps (Borson, Joseph) (Entered: 04/10/2017)
04/13/2017	<u>15</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 04/13/2017)
07/12/2017	<u>16</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 07/12/2017)
10/10/2017	<u>17</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 10/10/2017)
01/08/2018	<u>18</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 01/08/2018)

04/09/2018	<u>19</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 04/09/2018)
07/09/2018	<u>20</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 07/09/2018)
10/09/2018	<u>21</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 10/09/2018)
12/26/2018	<u>22</u>	Unopposed MOTION to Stay <i>Joint Status Report and Production Deadlines in Light of Lapse in Appropriations</i> by UNITED STATES DEPARTMENT OF STATE (Borson, Joseph) (Entered: 12/26/2018)
12/27/2018		MINUTE ORDER denying <u>22</u> Motion to Stay. The Court will instead extend the deadline for the next status report. The parties shall submit a joint status report no later than January 28, 2019 and every 90 days thereafter. Signed by Judge Rosemary M. Collyer on 12/27/2018. (DAS) (Entered: 12/27/2018)
12/27/2018		Set/Reset Deadlines/Hearings: Joint Status Report due by 1/28/2019. (zcdw) (Entered: 01/03/2019)
01/08/2019	<u>23</u>	Unopposed MOTION for Extension of Time to <i>Complete January 15, 2019 Production</i> by UNITED STATES DEPARTMENT OF STATE (Attachments: # <u>1</u> Text of Proposed Order)(Borson, Joseph) (Entered: 01/08/2019)
01/09/2019		MINUTE ORDER granting <u>23</u> Motion for Extension of Time to Complete Next Document Production. The extension of time shall run until appropriations are restored, plus the number of days between December 21, 2018 and the date that appropriations are restored. Signed by Judge Rosemary M. Collyer on 1/9/2019. (DAS) (Entered: 01/09/2019)
01/23/2019	<u>24</u>	Unopposed MOTION to Stay <i>Proceedings in Light of Continued Lapse in Appropriations</i> by UNITED STATES DEPARTMENT OF STATE (Borson, Joseph) (Entered: 01/23/2019)
01/23/2019		MINUTE ORDER denying <u>24</u> Motion to Stay and granting Motion to Extend Time to submit the next status report. The parties shall submit a joint status report no later than 21 days after appropriations are restored and every 90 days thereafter. Signed by Judge Rosemary M. Collyer on 1/23/2019. (DAS) Modified on 1/23/2019 (DAS). (Entered: 01/23/2019)
02/15/2019	<u>25</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 02/15/2019)
05/16/2019	<u>26</u>	Joint STATUS REPORT by CITIZENS UNITED. (McGill, Matthew) (Entered: 05/16/2019)